



FACT SHEET FOR DRAFT PERMIT

This Fact Sheet has been developed for a Controlled Hazardous Substance (CHS) permit renewal that the Maryland Department of the Environment (MDE) Land and Materials Administration is proposing to issue to:

Naval Support Activity Bethesda
Environmental Programs Division
4655 Taylor Road, Bldg. 27, 2nd Floor
Bethesda, Maryland 20889
EPA ID No. MD4170024687

The permit would renew CHS permit number A-221 previously issued to the facility to operate hazardous waste storage unit. This fact sheet was prepared in accordance with the requirements of Code of Maryland Regulations (COMAR) 26.13.07.20E.

A. Purpose of the Permitting Process

The purpose of the permitting process is to afford MDE, interested citizens, and other governmental agencies the opportunity to evaluate the ability of the applicant to comply with the applicable hazardous waste management requirements promulgated under the Environment Article, Annotated Code of Maryland §7-201 through §7-268, prior to operation of the facility. The applicant's ability is re-evaluated whenever MDE receives an application for renewal of, or a major modification to, an existing permit.

MDE is required to prepare a draft permit which sets forth in one concise document all the applicable requirements with which the agency requires the applicant to comply during the ten-year duration of the permit.

B. Permitting Procedures

The following is an outline of the sequential permitting process for CHS facility permits as required by Maryland's Environment Article:

1. MDE receives an application for a CHS permit. It publishes a notice once in each of two consecutive weeks at the applicant's expense informing the public of the receipt of the application, and the availability of the application material for public review. The notice also offers an opportunity for anyone to request an informational meeting.
2. An informational meeting is held if requested by the public or if MDE, at its discretion, deems that such a meeting will be beneficial. MDE will publish a notice of the informational meeting at the applicant's expense, if it is not included in the earlier

notice of application received. MDE requires the applicant to attend the meeting or the permit may be denied.

3. Following a detailed evaluation of the permit application, MDE prepares a tentative determination. This will include a proposal to issue or deny the permit and an explanation of the proposed action. If the tentative determination is to issue a permit, a draft permit is prepared.
4. MDE issues a notice at the applicant's expense informing the public of the tentative determination, allowing citizens 45 days to provide comments or to request a public hearing. MDE may schedule a public hearing at this stage and include an announcement of it in this public notice. The public hearing provides a means for citizens to comment on the tentative determination in a public forum. Alternatively, persons may choose to submit their comments in writing to MDE before the end of the comment period. As a matter of policy MDE requires applicants to attend public hearings or the permit may be denied.
5. MDE prepares a final determination if comments opposing the tentative determination are received during public comment period or the public hearing, or if MDE intends to make a final determination that is "substantively different" from the tentative determination. Otherwise, the publicized tentative determination becomes a final decision. The notice of final determination is advertised twice - once per week in two consecutive weeks. The final determination notice will include information on appeal procedures.

C. Action by MDE

MDE is issuing a notice of tentative determination to renew a permit previously issued to NSA Bethesda, allowing NSA Bethesda to continue to operate a hazardous waste treatment and storage facility. Written comments on the tentative determination or requests for a public hearing will be accepted until the close of business on May 3, 2021, and should be addressed to Ms. Kaley Laleker, Director, Land and Materials Administration, Maryland Department of the Environment, 1800 Washington Blvd., Suite 610, Baltimore, MD 21230-1719.

The permit application, the draft permit, and other pertinent information relating to MDE's tentative determination are on file at the offices of

**Resource Management Program
Land and Materials Administration
Maryland Department of the Environment
1800 Washington Blvd., Suite 610
Baltimore, MD 21230-1719**

A copy of the draft permit is also available for public review online on the Maryland Department of Environment's website at from a link under the heading "Are there any proposed actions currently open for public comment?" at <https://mde.maryland.gov/programs/LAND/HazardousWaste/Pages/index.aspx>.

To obtain more information, interested parties may contact Ms. Sylvie Osias, Project Engineer at (410) 537-3314. Arrangements can be made for obtaining copies of the documents at a reasonable cost.

D. Facility Description

Naval Support Activity (NSA) Bethesda is seeking to renew a CHS Facility Permit to operate a hazardous waste storage facility. The facility that is governed by this permit is referred to as Building 256. The function of the facility is to provide temporary centralized storage of hazardous waste that is generated by the on-site Naval Hospital and its supporting activities, and four additional tenant commands.

Building 256 has been designed specifically for proper management of hazardous wastes. Wastes are temporarily stored at the facility prior to shipment offsite for treatment, recycling or disposal.

Naval Support Activity (NSA) Bethesda is permitted to store up to two hundred and twelve 55-gallon drums of hazardous wastes at the facility. If the waste is stored in other types of containers, the maximum volume of waste in all containers cannot exceed 11,660 gallons. Chemicals stored within the unit are segregated according to their compatibility and are stored in containers approved for hazardous waste storage by the US Department of Transportation (DOT) regulations, incorporated by reference in COMAR 26.13.03.05A. A two-foot wide aisle space between the containers is maintained at all times.

Wastes may be stored in Building 256 as "lab-packs", which are small closed, individual chemical containers placed inside a 55-gallon drum with an inert packing absorbent surrounding the packed chemicals. Expired laboratory reagents may be stored in their original product containers. Some wastes may be stored as bulk liquids or solids in drums. All containers will be kept closed and maintained in good condition. Wastes will be evaluated or analyzed to ensure that wastes are properly segregated and stored based on their compatibility.

E. Permit Organization

The permit is divided into four parts and eight attachments as described in the following:

<u>Section</u>	<u>Topic</u>
Part I	Standard Conditions
Part II	General Facility Conditions
Part III	Specific Conditions for Storage of Hazardous Waste in Containers
Part IV	List of Attachments, Signature

Parts I and II contain conditions that generally apply to all hazardous waste facilities. Part III pertains specifically to the NSA Bethesda facility. Part IV is a list of attachments that are

included with the permit and a signature line to be completed if the permit is issued.

The permit attachments present detailed, facility specific information from the permit application, and are considered an enforceable part of the permit. The attachments are as follows:

Attachment 1	Waste Analysis Plan
Attachment 2	Procedures to Prevent Hazards
Attachment 3	Personnel Training
Attachment 4	Contingency Plan
Attachment 5	Closure Plan
Attachment 6	Facility Description
Attachment 7	Process Description and Container Management
Attachment 8	Part A Permit Application

F. Summary of the Permit Conditions

This section of the fact sheet presents tables for Parts I-IV of the draft permit that summarize the conditions in the draft permit. The regulatory authority for each permit condition is specified in the column titled "Regulation". All citations refer to regulations as codified in Title 26, Subtitle 13 of the Code of Maryland Regulations (COMAR 26.13), unless otherwise specified. The column titled "Permit Attachments" in the tables addressing Parts II and III specify where in the permit attachments additional details on facility operations of each permit condition can be found.

PART I
 STANDARD CONDITIONS

Part I of the permit sets forth the standard procedural conditions that are applicable to all hazardous waste management facilities.

<u>Permit Condition</u>	<u>Subject</u>	<u>Regulation COMAR 26.13.</u>
I.A	Effect of Permit	07.09
I.B	Permit Actions	07.11 & .12
I.C	Severability	07.05
I.D	Definitions	01.03, 02.02 and 02.03
I.E	Signatory Requirements	07.02B, 07.03 & 07.04L
I.F.	Documents to be maintained at the Facility	
I.F.1	Waste Analysis Plan	05.02D
I.F.2	Procedures to Prevent Hazards	05.02E, 05.02F and 05.03
I.F.3	Inspection Schedules and Logs	05.02F(2) and (4)
I.F.4	Personnel Training Information	05.02G(4) and G(5)
I.F.5	Contingency Plan	05.04
I.F.6	Closure Plan	05.07
I.F.7	Operating Record	05.05D
I.F.8	Copy of Current Version of COMAR	07.05A
I.F.9	Copy of the Permit and Permit Application	07.05A
I.F.10	Other Documents	07.05
I.G.	Duties and Requirements	
I.G.1	Duty to Comply	07.04B
I.G.2	Duty to Reapply	07.04C
I.G.3	Permit Expiration	(State Government Article, Annotated Code of MD §10-226(b)
I.G.4	Need to Halt or Reduce Activity	07.04D

<u>Permit Condition</u>	<u>Subject</u>	<u>Regulation COMAR 26.13.</u>
I.G.5	Duty to Mitigate	07.04E
I.G.6	Proper Operation and Maintenance	07.04F
I.G.7	Duty to Provide Information	07.04I
I.G.8	Inspection and Entry	07.04J
I.G.9	Monitoring and Records	05.05E(2) and 07.04K
I.G.10	Reporting Planned Changes	07.04M(1) and (2)
I.G.11	Transfer of Permit	07.04M(3), 07.10 and 05.02C(2)
I.G.12	Notification	07.04M(6), 07.15D, 05.04G(4) and (10)
I.G.13	Anticipated Non-Compliance	07.04M(2)
I.G.14	Other Non-compliance	07.04M(7)
I.G.15	Other Information	07.04M(8)
I.H	Certification of Construction or Modification	07.15C
I.I	Permit Fee	07.21
I.J	Compliance Schedules	07.04M(5) and 07.07D

PART II
GENERAL FACILITY CONDITIONS

Part II of the permit sets forth general conditions for this facility with which the Permittee must comply.

<u>Permit Condition</u>	<u>Subject</u>	<u>Regulation COMAR 26.13.</u>	<u>Permit Attachment</u>
II.A	Design and Operation of Facility	05.03B	5 and 7
II.B	General Waste Analysis	05.02D	1
II.C	General Inspection Requirements	05.02F	2
II.D	Personnel Training	05.02G	3
II.E	Preparedness and Prevention	05.03	2
II.F	Contingency Plan	05.04	4
II.G	Record Keeping and Reporting	05.05D, E, F and H	2, 4, 6
II.H	Closure Requirements	05.07	6
II.I	Financial Requirements	05.08	-
II.J	General Requirements for Ignitable, Reactive or Incompatible Wastes	05.02H	1, 5
II.K	Security	05.02E	2
II.L	Manifest System	05.05B, C & G	-
II.M	Floodplain Standard	05.02-1B, 07.02D(26) and (27)	7
II.N	Waste Minimization/Source Reduction	05.05F(4)(j) and (k)	6

PART III
 STORAGE IN CONTAINERS

Part III of the permit sets forth specific conditions for storage of hazardous waste in containers at the hazardous waste facility with which the Permittee must comply.

<u>Permit Condition</u>	<u>Subject</u>	<u>Regulation COMAR 26.13.</u>	<u>Permit Attachment</u>
III.A	General Management Requirements	07.05A	-
III.B	Permitted Storage Area	05.09 and .07.01A	7
III.C	Permitted and Prohibited Waste Identification	05.02D, 07.01A and 07.02D(14)	1,7,8
III.D	Condition of Containers	05.09B	2,5
III.E	Placement Requirements	05.09	2
III.F	Unknown Waste Identification	05.02D	1
III.G	Containment Systems	05.09H	5,7
III.H	Compatibility of Wastes Within Containers	05.09C	5
III.I	Management of Containers	05.09D and 05.02I(2)	2,5
III.J	Special Requirements for Ignitable or Reactive Wastes	05.02H, 05.09F	2,5,7
III.K	Special Requirements for Potentially Explosive or Shock Sensitive Wastes	-	5,7
III.L	Special Requirements for Incompatible Wastes	05.02H, 05.09G	2,5
III.M	Inspection Schedules and Procedures	05.09E	2
III.N	Record Keeping	05.05D, 05.05E, and 05.20	2
III.O	Closure	05.07, 05.09I	6

PART IV
PERMIT ATTACHMENTS

Permit Attachments 1 to 8 include sections of NSA Bethesda's permit renewal application and are an enforceable part of this permit. The following table cross-references these Permit Attachments to the appropriate sections in the application.

<u>Attachment Number</u>	<u>Title</u>	<u>Application Section</u>
1	Waste Analysis Plan	Section 3
2	Procedures to Prevent Hazards	Section 2.3
3	Personnel Training	Pages 1-5 Section 4
4	Contingency Plan	Section 5: pgs 1-6 Appendix A: cover page, pgs 1-22 Mutual aid agreements
5	Closure Plan	Pages 1-6 Section 6
6	Process Information	Pages 6-12 Section 2.2
7	Facility Description	Pages 1-18, 33-42, 43-48, Section 2.1: pgs.1-6Part B Appendix 1,2 and 9
8	Part A Permit Application	